

Message

From: Dresser, Chris [Dresser.Chris@epa.gov]
Sent: 9/24/2019 3:53:44 PM
To: Russ, Timothy [Russ.Tim@epa.gov]; Smith, Claudia [Smith.Claudia@epa.gov]
CC: Laumann, Sara [Laumann.Sara@epa.gov]
Subject: RE: General Conformity Emission Inventory U.B: BLM-UT Questions/R8 Responses

Thanks, Tim. Should I set up a time to discuss these questions?

Chris Dresser
U.S. EPA – Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129
Phone: (303) 312-6385

From: Russ, Timothy <Russ.Tim@epa.gov>
Sent: Friday, September 20, 2019 1:48 PM
To: Smith, Claudia <Smith.Claudia@epa.gov>; Dresser, Chris <Dresser.Chris@epa.gov>
Cc: Laumann, Sara <Laumann.Sara@epa.gov>
Subject: RE: General Conformity Emission Inventory U.B: BLM-UT Questions/R8 Responses

Claudia and Chris,

I'll make a couple of comments/observations and look for **Sara** to also offer an opinion (note – I'm looking at the below **Ex. 5 Deliberative Process (DP)**)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

(d) Notwithstanding the other requirements of this subpart, a conformity determination is not required for the following Federal actions (or portion thereof):

(1) The portion of an action that includes major or minor new or modified stationary sources that require a permit under the new source review (NSR) program (Section 110(a)(2)(c) and Section 173 of the Act) or the prevention of significant deterioration program (title I, part C of the Act).

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Please let me know if there are any questions and I appreciate your patience as I work into the practical general conformity issues.

Thanks!

Tim

Tim Russ
Environmental Scientist
USEPA Region 8
Air and Radiation Division
Air Toxics, Radiation and Modeling Branch
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From: Smith, Claudia <Smith.Claudia@epa.gov>
Sent: Tuesday, September 17, 2019 12:20 PM
To: Dresser, Chris <Dresser.Chris@epa.gov>; Russ, Timothy <Russ.Tim@epa.gov>
Subject: RE: [EXTERNAL] RE: General Conformity Emission Inventory

Tim and Chris,

I need to make one correction to my input Ex. 5 Deliberative Process (DP) See below.

Thanks,

Claudia

Claudia Young Smith | Environmental Scientist
Air Permitting and Monitoring Branch
U.S. EPA Region 8
Tel: (303) 312-6520 | *Email:* smith.claudia@epa.gov
Web: <http://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region>
Mail: 1595 Wynkoop Street, Mail Code 8ARD-PM, Denver, Colorado 80202

From: Dresser, Chris <Dresser.Chris@epa.gov>
Sent: Tuesday, September 17, 2019 12:01 PM
To: Russ, Timothy <Russ.Tim@epa.gov>
Cc: Smith, Claudia <Smith.Claudia@epa.gov>
Subject: RE: [EXTERNAL] RE: General Conformity Emission Inventory
Importance: High

Tim,
Are you okay with the following response to Erik? Let me know if you have edits, or if we need more discussion.

.....
Erik,

Ex. 5 Deliberative Process (DP)

Claudia Young Smith | Environmental Scientist
Air Permitting and Monitoring Branch
U.S. EPA Region 8
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Web: <http://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region>
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From: Dresser, Chris <Dresser.Chris@epa.gov>
Sent: Wednesday, September 11, 2019 3:06 PM
To: Smith, Claudia <Smith.Claudia@epa.gov>

Cc: Russ, Timothy <Russ.Tim@epa.gov>

Subject: FW: [EXTERNAL] RE: General Conformity Emission Inventory

Claudia,

Please see the following email from Erik Vernon at BLM. Are there easy responses to his questions? If this needs some discussion, I'm happy to set up a meeting.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Chris Dresser

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1595 Wynkoop Street

Denver, Colorado 80202-1129

Phone: (303) 312-6385

Referred to BLM

Referred to BLM

Referred to BLM

On Mon, Jul 29, 2019 at 7:53 AM Dresser, Chris <Dresser.Chris@epa.gov> wrote:

Eric,

Apologies for the delayed response. I've got a few clarifying questions:

Ex. 5 Deliberative Process (DP)

consider the provisions of the 40 CFR 93.153(a)(5)(D)(iv) which note:

(iv) Where EPA has not approved a revision to the relevant SIP since the area was designated or reclassified, the total of direct and indirect emissions from the action for the future years (described in §93.159(d)) do not increase emissions with respect to the baseline emissions:

(A) The baseline emissions reflect the historical activity levels that occurred in the geographic area affected by the proposed Federal action during:

- (1) The most current calendar year with a complete emission inventory available before an area is designated unless EPA sets another year; or
- (2) The emission budget in the applicable SIP;
- (3) The year of the baseline inventory in the PM-10 applicable SIP;
- (B) The baseline emissions are the total of direct and indirect emissions calculated for the future years (described in §93.159(d)) using the historic activity levels (described in paragraph (a)(5)(iv)(A) of this section) and appropriate emission factors for the future years; or

Ex. 5 Deliberative Process (DP)

I'm currently at the emissions inventory conference in Dallas, but will be back in the office on Thursday if you want to chat. Also, I will be going to vernal later next month for the UB Energy Summit.

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